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November 20, 2024

APPLICATION GRANTED
SO ORDERED *[signature]*
VERNON S. BRODERICK
U.S.D.J. 11/21/2024

VIA ECF

Hon. Vernon S. Broderick
U.S. District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Brown v. Frankie Shop LLC et al*, Civ. No. 24-cv-05688-VSB
       **Letter Motion on Consent Requesting Extensions of Time to Respond to Plaintiff's
       Complaint and Defendant Flemington Estates LLC's Crossclaim**

Dear Judge Broderick:

As you are aware, we represent Defendant Frankie Shop LLC ("Frankie Shop") in the above-referenced action. Frankie Shop respectfully moves the Court to reset the following deadlines as set forth in the below chart:

EVENT	CURRENT DEADLINE	REQUESTED EXTENSION
Frankie Shop's deadline to answer, move, or otherwise respond to Plaintiff's Complaint	November 25, 2024	January 9, 2025
Frankie Shop's deadline to answer, move, or otherwise respond to Defendant Flemington Estates LLC's Crossclaim	December 4, 2024	January 9, 2025

Zaanouni Law Firm & Associates ► LuatViet ► Fernanda Lopes & Associados ► Guevara & Gutierrez ► Paz Horowitz Abogados ► Sirote ►
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Both Plaintiff's counsel and Defendant Flemington Estates LLC's counsel consent to these respective requests for extensions of time.

Frankie Shop previously requested the following: (i) two extensions of time to answer, move, or otherwise respond to Plaintiff's Complaint (Dkts. 12 and 18), which the Court granted on August 15, 2024 and October 21, 2024, respectively (Dkts. 13 and 19); and (ii) one extension of time to extend its deadline to answer, move, or otherwise respond to Defendant Flemington Estates LLC's Crossclaim (Dkt. 18), which the Court granted on October 21, 2024. (Dkt. 19.) Frankie Shop seeks these extensions to permit the parties to continue meaningful discussions regarding Plaintiff's allegations.

We thank the Court for its time and courtesies.

Respectfully submitted,

/s/ Mary Kate Brennan

Mary Kate Brennan
Senior Attorney

cc: All counsel of record (via ECF)